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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

CONSOLIDATED RESORTS, INC.,  
and DOES 1-10, Inclusive,

Defendants.

Case No.: CV-S-\_\_\_\_\_

**COMPLAINT--TITLE VII  
CIVIL RIGHTS**

- **SEXUAL HARASSMENT**
- **NATIONAL ORIGIN**
- **RETALIATION**

**DEMAND FOR JURY TRIAL**

**NATURE OF THE ACTION**

1. This is an action under Title VII of the Civil Rights Act of 1964 and Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of sex, and to provide appropriate relief to the Charging Party, who was adversely affected by such practices. Plaintiff U.S. Equal Employment Opportunity Commission alleges that the defendants discriminated against the

1 Charging Party who was sexually harassed or subjected to sex-based harassment  
2 during her employment with Defendant, Consolidated Resorts, Inc.

3 **JURISDICTION**

4 2. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451,  
5 1331, 1337, 1343 and 1345. This action is authorized and instituted pursuant to §  
6 704(a) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §  
7 2000e-3; §§ 706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, as  
8 amended, 42 U.S.C. § 2000e-5(f)(1) and (3) ("Title VII"), and § 102 of the Civil  
9 Rights Act of 1991, 42 U.S.C. § 1981a.

10 **VENUE**

11 3. The employment practices alleged herein to be unlawful were  
12 committed within the jurisdiction of the United States District Court for the  
13 District of Nevada.

14 **PARTIES**

15 4. Plaintiff, the U.S Equal Employment Opportunity Commission  
16 ("EEOC" or "Commission"), is the agency of the United States of America  
17 charged with the administration, interpretation and enforcement of Title VII, and is  
18 expressly authorized to bring this action by Section 706(f)(1) and (3) of Title VII,  
19 42 U.S.C. § 2000e-5(f)(1) and (3).

20 5. At all relevant times, Defendant CONSOLIDATED RESORTS, INC.  
21 was and has continuously been a Nevada corporation doing business in the State of  
22 Nevada, County of Clark, and has continuously had at least 15 employees.

23 6. During the relevant periods alleged in this Complaint, Defendant  
24 Consolidated Resorts, Inc. ("Defendant") has employed the Charging Party.

25 7. At all relevant times, Defendant Employer has continuously been  
26 employer engaged in an industry affecting commerce within the meaning of  
27 Sections 701(b), (g) and (h) of Title VII, 42 U.S.C. §§ 2000e(b), (g) and (h).

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**STATEMENT OF CLAIMS**

12. More than thirty days prior to the institution of this lawsuit, the Charging Party filed a charge with the Commission alleging violations of Title VII by Defendant Employer. All conditions precedent to the institution of this lawsuit have been fulfilled.

13. From at least as early as June 2004, through at least September 11, 2004, Defendant Employer individually and collectively engaged in unlawful employment practices at their Las Vegas, Nevada, location, in violation of § 706(f)(1) and (3) of Title VII, 42 U.S.C. § 2000e-5(f)(1) and (3). The unlawful sexual harassment and sex based harassment of the Charging Party was in the form of verbal, visual and physical harassment. The Charging Party was forced to engage in oral sex and was subjected to degrading acts that impacted the terms and conditions of her employment and created a hostile working environment at “Defendant Employer” that resulted in a tangible employment action.

14. The impact of the aforementioned conduct deprived the Charging Party and others similarly situated of equal employment opportunities and otherwise adversely impacted their employment status because of their sex.

15. The unlawful employment practices complained of above were done with malice or with reckless indifference to the federally protected rights of the Charging Party. The unlawful employment practices complained of above were and are willful within the meaning of §§ 706(f)(1) and (3) of Title VII, 42 U.S.C. §§ 2000e-5(f)(1) and (3) and caused the Charging Party to suffer emotional distress.

16. Defendant Employer has acted with malice or reckless indifference to the federally protected rights of the Charging Party by subjecting her to harassment consisting of Charging Party being forced to perform oral sex upon Supervisors and the General Sales Manager in order to keep her job. The Charging Party was also subjected to unwanted touching of her breasts and her private area.



**PRAYER FOR RELIEF**

Wherefore, the Commission respectfully requests that this Court:

A. Grant a permanent injunction enjoining Defendant Employer, their officers, successors, assigns, and all persons in active concert or participation with it, from engaging in sex discrimination and any other employment practice which discriminates on the basis of sex.

B. Order Defendant Employer to institute and carry out policies, practices, and programs which provide equal employment opportunities for women, and which eradicate the effects of their past unlawful employment practices.

C. Order Defendant Employer to make whole Charging Party, by providing appropriate back pay with prejudgment interest, in amounts to be determined at trial, and other affirmative relief necessary to eradicate the effects of their unlawful employment practices, including but not limited to compensation for loss of seniority and benefits, plus prejudgment interest.

D. Order Defendant Employer to make whole Charging Party, by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described above, in amounts to be determined at trial.

E. Order Defendant Employer to make whole Charging Party by providing compensation for past and future nonpecuniary losses resulting from the unlawful practices complained of above, including emotional pain, suffering, inconvenience, loss of enjoyment of life, and humiliation, in amounts to be determined at trial.

F. Order Defendant Employer to pay Charging Party punitive damages for their malicious and reckless conduct described above, in amounts to be determined at trial.

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1 G. Grant such further relief as the Court deems necessary and proper in  
2 the public interest.

3 H. Award the Commission its costs of this action.

4 JURY TRIAL DEMAND

5 The Commission requests a jury trial on all questions of fact raised by its  
6 complaint.

7 Respectfully submitted,

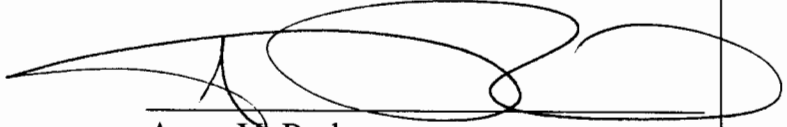
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9 Dated: September 7, 2006.

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION

11 Ronald S. Cooper  
12 General Counsel

13 James L. Lee  
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15 Gwendolyn Young Reams  
16 Associate General Counsel

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19 Anna Y. Park  
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